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June 21, 2007

The Los Angeles Fire Department is pleased to respond to the Evaluation Report from the Evaluation held on April 12th and 13th, 2006. We apologize for the delay in submitting the report.

The following is our response to the Evaluation Report.

2	The CUPA is evaluating PA inspectors during facility inspections; however, the PA is not evaluated on the maintenance of their inspection reports, facility enforcement and return to compliance documentation, and staff training records.	At the time of the CUPA self-audit, evaluate PA inspection reports, facility enforcement and return to compliance, and staff training records. <i>This has been done. The PA inspectors have been trained properly.</i>	September 30, 2006
4	The UST operating permit does not contain the monitoring options used for the tank and piping systems or have a statement that the monitoring, response, and plot plans are to be maintained on site with the permit.	Include how the tank and piping systems are monitored on the operating permit, and verbiage that states that the approved monitoring, response, and plot plans are to be maintained on site with the permit. <i>This has been done. See below for more information.</i>	July 13, 2006

The following is the information for the operating permit:

Mr. Kareem Taylor
May 16, 2007
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(a) The underground storage tank shall be designed and constructed to provide primary and secondary levels of containment of the hazardous substances stored in it in accordance with the following performance standards:

- Primary containment shall be product-tight and compatible with the substance stored.
 - Secondary containment shall be constructed to prevent structural weakening as a result of contact with any released hazardous substances, and also shall be capable of storing the hazardous substances for the maximum anticipated period of time necessary for the recovery of any released hazardous substance.
 - In the case of an installation with one primary container, the secondary containment shall be large enough to contain at least 100 percent of the volume of the primary tank.
 - In the case of multiple primary tanks, the secondary container shall be large enough to contain 150 percent of the volume of the largest primary tank placed in it, or 10 percent of the aggregate internal volume of all primary tanks, whichever is greater.
 - Should soil sampling be required, the soils report must be submitted within 30 days of the soil sampling.
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- Tank and piping monitoring systems, and maintenance of the approved monitoring, response and plot to be maintained onsite with the permit.
 - The inspectors will review all permitting information that has been submitted prior to their inspections.
 - The inspectors will review the permitting information for completeness, and will verify that it is accurate for the facility. During the inspection the inspector will compare what is submitted to the information located at the facility.

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Sincerely,

Valerie Toney, Manager
Hazardous Materials Programs
Los Angeles Fire Department